

R. Hance Haney
Executive Director – Federal Regulatory

1020 19th Street NW, Suite 700
Washington, DC 20036

202 429 3125
202 293 0561 fax
Email hhaney@qwest.com



April 8C, 2003

EX PARTE

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: Application by Qwest Communications International Inc. for
Authority to Provide In-Region InterLATA Services in New
Mexico, Oregon and South Dakota; WC Docket No. 03-11**

Dear Ms. Dortch:

On April 3, 2003, Qwest Communications International Inc. ("Qwest") responded to various *ex parte* filings submitted by WorldCom in the above-referenced proceeding.¹ Included in Qwest's response was confidential performance data relating to AT&T's UNE-P trial in Minnesota. To ensure that the record in this proceeding is complete, Qwest submits this filing, at the request of Commission staff, to demonstrate that AT&T's data, collected in the course of the UNE-P trial, confirms that AT&T was able to achieve low reject rates for UNE-P LSRs.² AT&T submitted thousands of UNE-P LSRs in the course of the trial.³ During Phase I of the trial, AT&T's reject rates were 3.80% under Q-PID-PO-4B-1 and 0.47% under Q-PID-PO-4B-2.⁴ During Phase II of the trial, AT&T's reject rates were 12.80% under Q-PID-PO-4B-1 and 1.49% under Q-PID-

¹ See Qwest April 3, 2003, Ex Parte, WC Docket No. 03-11 ("Qwest April 3 Ex Parte").

² Attachments A and B to this *ex parte* filing were submitted by Qwest on November 18, 2002, in the Qwest III proceeding. See Qwest November 18 Ex Parte, WC Docket No. 02-314. Prior to that date, these documents had been filed by AT&T on a non-confidential basis in the Minnesota (State) Section 271 proceeding.

³ See Qwest April 3 Ex Parte at Confidential Attachment A4.

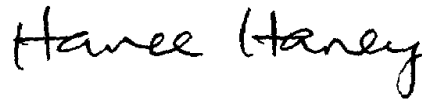
⁴ See Attachment A, AT&T Phase I Consumer Metrics, at 1. The AT&T Phase I Consumer Metrics chart mistakenly reversed the results for Q-PID-PO-4B-1 and Q-PID-PO-4B-2. The results appear in their correct order above. Also, although AT&T modeled its performance metrics for reject rates on PIDs PO-4B-1 and PO-4B-2, Qwest's calculations under these PIDs differ slightly (though not materially) from AT&T's results.

PO-4B-2.⁵ These results are consistent with the confidential performance data Qwest provided the Commission in its April 3 Ex Parte.⁶

Qwest also submits this filing, at the request of Commission staff, to clarify that, as of March 22, 2003, the number of order rejects experienced by WorldCom because of feature identification issues declined substantially. WorldCom's filings in this docket confirm this. For instance, in its Reply Comments, WorldCom notes that in February its reject rate was over 60%, and that "approximately 60% of these rejects" related to "issues concerning feature information."⁷ Thus, approximately one-third of all WorldCom EDI orders in February were rejected for feature identification reasons. In an *ex parte* filing on April 2, 2003, WorldCom stated that, after "the latest workaround was put in place" on March 21, only 12% of its rejected LSRs were rejected "for reasons related to the customers' features."⁸ Although WorldCom claims that the 12% reject rate may not accurately predict the company's experience going forward because many of the LSRs it submitted after March 21 were "re-flows" of orders that previously had been rejected, WorldCom's figures are consistent with the confidential data Qwest provided to the Commission in connection with WorldCom's reject rates for feature identification on single- and multi-line accounts.⁹

The twenty-page limit does not apply to this filing. Please contact the undersigned if you have any questions concerning this submission.

Respectfully submitted,



Hance Haney

cc: K. Cook
W. Dever
G. Remondino
J. Myles
K. Brown

⁵ See Attachment B, AT&T Phase II Consumer Metrics, at 1. As with Phase I, the AT&T Phase II Consumer Metrics chart mistakenly reversed the results for PO-4B-1 and PO-4B-2. The results appear in their correct order above.

⁶ See Qwest April 3 Ex Parte at Attachment A, p. 2, and Confidential Attachment A4.

⁷ WorldCom Reply Comments, WC Docket No. 02-11, February 27, 2003, at 3. WorldCom goes on to explain that "most of these rejects were caused by . . . multi-line CSRs . . . [in which] feature information on those CSRs is often . . . out of sequence." *Id.*

⁸ See *id.* at 1-2.

⁹ See Qwest April 3 Ex Parte at Attachment A, p. 3-5 and Confidential Attachment A6.

Marlene H. Dortch
April 8, 2003
Page 3

R. Harsch
H. Best
D. Booth
K. Cremer
A. Medeiros
R. Weist